

Nov 15 2021

CLERK U.S. DISTRICT COURT
DISTRICT OF ARIZONA

UNITED STATES DISTRICT COURT

for the

Western District of Washington

SEALED

United States of America

v.

21-06052M

Case No. CR20-120(15) RSM

RAMON ALBERTO VALERDE SERNAS

*Defendant***ARREST WARRANT**

To: Any authorized law enforcement officer

YOU ARE COMMANDED to arrest and bring before a United States magistrate judge without unnecessary delay(name of person to be arrested) RAMON ALBERTO VALERDE SERNAS,

who is accused of an offense or violation based on the following document filed with the court:

- ☒ Indictment
 ☐ Superseding Indictment
 ☐ Information
 ☐ Superseding Information
 ☐ Complaint
☐ Probation Violation Petition
☐ Supervised Release Violation Petition
☐ Violation Notice
☐ Order of the Court

This offense is briefly described as follows:

Count 1, Conspiracy to Commit Money Laundering, in violation of Title 18, United States Code, Sections 1956 and 1957.

Date: 08/12/2020*Issuing officer's signature*City and state: Seattle, WashingtonMary Alice Theiler, United States Magistrate Judge*Printed name and title***Return**This warrant was received on (date) 08/12/2020, and the person was arrested on (date) 11/13/2021
at (city and state) Nogales, Arizona.Date: 11/15/2021Digitally signed by JUSTIN T CHUMLEY
Date: 2021.11.15 09:23:34 -07'00'*Arresting officer's signature*Justin Chumley Special Agent*Printed name and title*

NDN

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence
of the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington
August 12, 2020

WILLIAM M. McCOOL, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,

Plaintiff,

v.

1. BARBARA P. CARRENO ORTEGA,
2. LUIS A. CARRENO ORTEGA,
3. ERIKA VIVIANA CARRENO
ORTEGA,
4. MARIA TERESA VALENCIA
RENTERIA,
5. JORGE G. DURAN ACOSTA,
6. SONIA L. MEZQUITA VEGA,
7. DALIA L. ARCINIEGA
BECERRA,
8. JORGE JESUS NAVARRETE,
9. RAFAEL ALEJANDRO CANEZ,
10. ROLANDO ESPINDOLA
HERNANDEZ,
11. JORGE LOPEZ CORRAL,
12. ARMANDO LOPEZ CORRAL,
13. ALEXIS BARON MERCADO,
14. JORGE VALDEZ,
15. RAMON ALBERTO VALERDE
SERNAS,
16. PEDRO PARRA,
17. FRANCISCO VALDEZ BUSANI,

Defendants.

NO. CR20-120 RSM

INDICTMENT

SEALED

The Grand Jury charges that:

COUNT 1

(Conspiracy to Commit Money Laundering)

Beginning at a date unknown, and continuing until on or about August 12, 2020, in the Western District of Washington, and elsewhere, BARBARA P. CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, ERIKA VIVIANA CARRENO ORTEGA, MARIA TERESA VALENCIA RENTERIA, JORGE G. DURAN ACOSTA, SONIA L. MEZQUITA VEGA, DALIA L. ARCINIEGA BECERRA, JORGE JESUS NAVARRETE, RAFAEL ALEJANDRO CANEZ, ROLANDO ESPINDOLA HERNANDEZ, JORGE LOPEZ CORRAL, ARMANDO LOPEZ CORRAL, ALEXIS BARON MERCADO, JORGE VALDEZ, RAMON ALBERTO VALERDE SERNAS, PEDRO PARRA, FRANCISCO VALDEZ BUSANI, and others known and unknown, did knowingly combine, conspire, confederate and agree together and with each other to commit certain money laundering offenses under Title 18, United States Code, Sections 1956 and 1957, to wit:

(1956(a)(1)(B)(i))

BARBARA P. CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, ERIKA VIVIANA CARRENO ORTEGA, MARIA TERESA VALENCIA RENTERIA, JORGE G. DURAN ACOSTA, SONIA L. MEZQUITA VEGA, DALIA L. ARCINIEGA BECERRA, JORGE JESUS NAVARRETE, RAFAEL ALEJANDRO CANEZ, ROLANDO ESPINDOLA HERNANDEZ, JORGE LOPEZ CORRAL, ARMANDO LOPEZ CORRAL, ALEXIS BARON MERCADO, JORGE VALDEZ, RAMON ALBERTO VALERDE SERNAS, PEDRO PARRA, FRANCISCO VALDEZ BUSANI,

(1) Did knowingly conduct, attempt to conduct, and aid and abet others in conducting, financial transactions, that is: transactions involving the movement of funds by wire and other means affecting interstate and foreign commerce, and transactions involving the use of a financial institution which is engaged in and affects interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, distribution of controlled substances, in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(A), and 846, knowing that the property involved in the financial transactions represents the proceeds of some form of unlawful activity --

1 (B) knowing that the transactions are designed in whole or in part --

2 (i) to conceal and disguise the nature, the location, the source, the ownership,
3 and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United
4 States Code, Section 1956(a)(1)(B)(i);

5 (1957)

6 BARBARA P. CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, ERIKA
7 VIVIANA CARRENO ORTEGA, MARIA TERESA VALENCIA RENTERIA, JORGE G.
8 DURAN ACOSTA, SONIA L. MEZQUITA VEGA, DALIA L. ARCINIEGA BECERRA,
9 JORGE JESUS NAVARRETE, RAFAEL ALEJANDRO CANEZ, ROLANDO ESPINDOLA
10 HERNANDEZ, JORGE LOPEZ CORRAL, ARMANDO LOPEZ CORRAL, ALEXIS BARON
11 MERCADO, JORGE VALDEZ, RAMON ALBERTO VALERDE SERNAS, PEDRO PARRA,
12 FRANCISCO VALDEZ BUSANI,

13 Did knowingly engage, attempt to engage, and aid and abet, transactions by through or to
14 a financial institution, affecting interstate or foreign commerce, in criminally derived property of
15 a value greater than \$10,000, that is the deposit of U.S. currency, such property having been
16 derived from a specified unlawful activity, that is, the distribution of controlled substances, in
17 violation of Title 18, United States Code, Section 1957.

18 (1956(a)(2)(B)(i))

19 BARBARA P. CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, ERIKA
20 VIVIANA CARRENO ORTEGA, MARIA TERESA VALENCIA RENTERIA, JORGE G.
21 DURAN ACOSTA, SONIA L. MEZQUITA VEGA, DALIA L. ARCINIEGA BECERRA,
22 JORGE JESUS NAVARRETE, RAFAEL ALEJANDRO CANEZ, ROLANDO ESPINDOLA
23 HERNANDEZ, JORGE LOPEZ CORRAL, ARMANDO LOPEZ CORRAL, ALEXIS BARON
24 MERCADO, JORGE VALDEZ, RAMON ALBERTO VALERDE SERNAS, PEDRO PARRA,
25 FRANCISCO VALDEZ BUSANI

26 Did knowingly transport, transmit and transfer, and attempt to transport, transmit and
27 transfer, and cause, aid and abet others to knowingly transport, transmit and transfer, monetary
28 instruments and funds from a place within the United States to or through a place outside the
United States

1 (B) knowing that the monetary instrument or funds involved in the transportation,
2 transmission and transfer represented the proceeds of some form of unlawful activity, that is,
3 conspiracy to distribute controlled substances, in violation of Title 21, United States Code,
4 Sections 841(a)(1), 841(b)(1)(A), and 846, and knowing such transportation, transmission and
5 transfer was designed in whole or in part --

6 (i) to conceal and disguise the nature, the location, the source, the ownership,
7 and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United
8 States Code, Section 1956(a)(2)(B)(i);

9 Manner and Means

10 The manner and means used to accomplish the objectives of the conspiracy included,
11 among others, the following:

12 1. It was part of the conspiracy that siblings BARBARA P. CARRENO ORTEGA,
13 LUIS A. CARRENO ORTEGA, ERIKA VIVIANA CARRENO ORTEGA and others known
14 and unknown owned and/or operated a "Casa de Cambio" (money exchange business) in
15 Nogales, Sonora, Mexico called "Dos Banderas." Dos Banderas operated as a front for a money
16 laundering organization conducted by the CARRENO ORTEGA siblings as part of the
17 conspiracy.

18 2. It was part of the conspiracy that BARBARA P. CARRENO ORTEGA, LUIS A.
19 CARRENO ORTEGA, ERIKA VIVIANA CARRENO ORTEGA contracted with drug
20 traffickers in Mexico to pick up proceeds from the illicit sale of controlled substances in
21 violation of Title 21, United States Code Section 841 *et seq.* and arrange for the transfer of said
22 proceeds back to Mexico in a manner designed to hide the nature, source, ownership and control
23 of said proceeds and to avoid detection of, and subsequent seizure by, law enforcement of said
24 proceeds. The CARRENO ORTEGA siblings charged the drug traffickers a percentage fee of
25 the amount of money moved for their services.

26 3. It was part of the conspiracy that BARBARA P. CARRENO ORTEGA, LUIS A.
27 CARRENO ORTEGA, ERIKA VIVIANA CARRENO ORTEGA recruited, and caused others
28 (including but not limited to defendants JORGE G. DURAN ACOSTA, RAFAEL
ALEJANDRO CANEZ, and RAMON ALBERTO VALVERDE SERNAS) to recruit individuals
to open bank accounts with Wells Fargo Bank, N.A., a financial institution whose operations

1 affect interstate and foreign commerce. Most of the Wells Fargo accounts were opened in
2 Arizona. BARBARA P. CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, ERIKA
3 VIVIANA CARRENO ORTEGA and others known and unknown would pay, and/or cause
4 others to pay, the account holders to open said accounts. The account holders would often turn
5 over the information about the account opened in their name, including any ATM cards and
6 personal identification numbers (PINs) to the CARRENO ORTEGA siblings after opening the
7 account.

8 4. It was part of the conspiracy that these bank accounts (hereafter, referred to as
9 “funnel accounts”) were opened with the purpose and objective of using the accounts to collect,
10 transfer and funnel large amounts of U.S. currency generated by the illicit sale of controlled
11 substances in various states across the United States of America, including but not limited to the
12 states of Washington, Kansas, New York, New Mexico, Ohio and Maryland, in violation of Title
13 21, United States Code, Section 841(a)(1) *et seq.* back to southern Arizona and Mexico.

14 5. It was part of the conspiracy that defendants LUIS A. CARRENO ORTEGA,
15 DALIA L. ARCINIEGA BECERRA, SONIA L. MEZQUITA VEGA, RAFAEL ALEJANDRO
16 CANEZ, ARMANDO LOPEZ CORRAL, ALEXIS BARON MERCADO, JORGE VALDEZ,
17 RAMON ALBERTO VALVERDE SERNAS, PEDRO PARRA and FRANCISCO VALDEZ
18 BUSANI all opened funnel accounts as part of the conspiracy, among many others. Some of the
19 other funnel account holders are identified herein by their initials as unindicted co-conspirators,
20 including J.A.G.A., A.O., D.S.M., C.G.R., A.O., J.R.V., N.Y.G., L.G.G., C.A.R., J.L.S., I.J.R.,
21 S.N.A., M.Y.C., M.A.C., E.M.R., P.W., C.Y.S., P.Y.B., A.I.B., J.R., J.W.G., M.F.A., A.M.V.,
22 A.R., E.L.C. and V.V.L.

23 6. It was part of the conspiracy that BARBARA P. CARRENO ORTEGA, LUIS A.
24 CARRENO ORTEGA, ERIKA VIVIANA CARRENO ORTEGA and others known and
25 unknown recruited, and caused others to recruit, individuals (hereafter referred to as money
26 couriers) to travel to these various locations within the United States to meet with drug
27 traffickers who were in possession of large amounts of U.S. currency generated by the sale of
28 controlled substances, who had a need to return that money back to Mexico. BARBARA P.
CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, ERIKA VIVIANA CARRENO

1 ORTEGA would pay the money couriers travel expenses and additional cash as a fee for their
2 services.

3 7. It was part of the conspiracy that defendants LUIS A. CARRENO ORTEGA,
4 DALIA L. ARCINIEGA BECERRA, SONIA L. MEZQUITA VEGA, JORGE JESUS
5 NAVARRETE, RAFAEL ALEJANDRO CANEZ, ROLANDO ESPINDOLA HERNANDEZ,
6 JORGE LOPEZ CORRAL, ARMANDO LOPEZ CORRAL, ALEXIS BARON MERCADO,
7 JORGE VALDEZ, RAMON ALBERTO VALVERDE SERNAS, PEDRO PARRA and
8 FRANCISCO VALDEZ BUSANI and others known and unknown acted as money couriers.
9 The money couriers knew the U.S. currency they were picking up was the proceeds of the sale of
10 controlled substances, and that the deposits they were making into Wells Fargo were designed, in
11 whole or in part, to conceal the nature, location, source, ownership and control of the proceeds.

12 8. It was part of the conspiracy that BARBARA P. CARRENO ORTEGA, LUIS A.
13 CARRENO ORTEGA, ERIKA VIVIANA CARRENO ORTEGA and others known and
14 unknown would direct these money couriers, including telling them where to go and who to meet
15 with, and would often make or cause others to make and pay for travel arrangements for the
16 money couriers.

17 9. It was part of the conspiracy that BARBARA P. CARRENO ORTEGA, LUIS A.
18 CARRENO ORTEGA, ERIKA VIVIANA CARRENO ORTEGA and others known and
19 unknown would direct the money couriers to pick up the large amounts of U.S. currency
20 generated by the illicit sale of controlled substances across the United States – often hundreds of
21 thousands of dollars – and direct them into which Wells Fargo funnel accounts the U.S. currency
22 should be deposited. The money couriers typically deposited the U.S. currency into the Wells
23 Fargo funnel accounts. The deposits were often made in amounts well over \$10,000; at other
24 times, and later in the conspiracy, the U.S. currency was broken into smaller amounts under
25 \$10,000 in an attempt to avoid law enforcement attention.

26 10. It was part of the conspiracy that these money couriers, at the direction of
27 BARBARA P. CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, ERIKA VIVIANA
28 CARRENO ORTEGA and others known and unknown, deposited U.S. currency generated by
the illicit sale of controlled substances into funnel accounts in multiple states and federal judicial
districts across the United States, including in the states of Washington (including in the Western

1 District of Washington), Kansas, New York, New Mexico, Ohio and Maryland, and elsewhere.
2 The total amount deposited as part of the conspiracy is unknown, but is believed to exceed \$10
3 million in U.S. currency.

4 11. It was part of the conspiracy that after the U.S. currency generated by the illicit
5 sale of controlled substances was deposited into the funnel accounts, the money was quickly
6 withdrawn from the accounts. Sometimes the proceeds were withdrawn in the form of cash from
7 Wells Fargo branches in Arizona, and then carried by other individuals across the border back
8 into Mexico, and ultimately transferred to the confederates of the drug traffickers in that country.
9 Other times, the money was wire transferred from the Wells Fargo funnel accounts into Mexican
10 bank accounts for the benefit of drug traffickers in Mexico. Defendant MARIA TERESA
11 VALENCIA RENTERIA facilitated and caused said wire transfers as part of the conspiracy.

12 All in violation of Title 18, United States Code, Section 1956(h).

13 **COUNTS 2 - 42**

14 **(Money Laundering - 1956(a)(1)(B)(i))**

15 On or about the dates set forth below, in the Western District of Washington, and
16 elsewhere, BARBARA P. CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, and ERIKA
17 VIVIANA CARRENO ORTEGA and the Defendants specified in each Count below, and did
18 knowingly conduct and attempt to conduct, and did aid and abet the conduct of, a financial
19 transaction affecting interstate and foreign commerce, to wit, the deposit of cash into third party
20 bank accounts at Wells Fargo, a financial institution whose activities affect interstate and foreign
21 commerce, which involved the proceeds of a specified unlawful activity, that is distribution of
22 controlled substances in Violation of Title 21, United States Code, Section 841(a)(1), knowing
23 that the transaction was designed in whole and in part to conceal and disguise, the nature,
24 source, ownership, and control of the proceeds of said specified unlawful activity and that while
25 conducting and attempting to conduct such financial transaction knew that the property involved
26 in the financial transaction represented the proceeds of some form of unlawful activity.
27
28

| COUNT | DATE ¹ | DEPOSITOR/ DEFENDANT | WELLS FARGO BRANCH LOCATION | ACCOUNT HOLDER/ DEFENDANT | AMOUNT OF CASH DEPOSITED OR WITHDRAWN |
|-------|-------------------|----------------------------------|--------------------------------------|----------------------------------|---|
| 2. | 7/29/2015 | JORGE J. NAVARRETTE | Lenexa, Kansas | J.A.G.A. | \$34,965 |
| 3. | 7/29/2015 | JORGE J. NAVARRETTE | Shawnee, KS | A.O. | \$35,000 |
| 4. | 7/29/2015 | JORGE J. NAVARRETTE | Overland Park, KS | D.S.M. | \$35,032 |
| 5. | 12/31/2015 | SONIA L. MEZQUITA VEGA | Tucson, Arizona | DALIA L. ARCINIEGA BECERRA | \$32,500 |
| 6. | 2/3/2016 | SONIA L. MEZQUITA VEGA | Nogales, AZ | C.G.R. | \$39,980 |
| 7. | 3/14/2016 | DALIA L. ARCINIEGA BECERRA | Lynnwood, WA | A.O. | \$20,200 |
| 8. | 3/14/2016 | DALIA L. ARCINIEGA BECERRA | Everett, WA | J.R.V. | \$35,971 |
| 9. | 3/14/2016 | SONIA L. MEZQUITA VEGA | Lynnwood, WA | N.Y.G. | \$30,030 |
| 10. | 3/16/2016 | SONIA L. MEZQUITA VEGA | Nogales, AZ | ARMANDO LOPEZ CORRAL | \$35,971 |
| 11. | 3/31/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | L.G.G. | \$39,620 |
| 12. | 3/31/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | C.A.R. | \$40,884 |
| 13. | 3/31/2016 | ARMANDO LOPEZ CORRAL | New York, NY | J.L.S. | \$40,332 |
| 14. | 4/1/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | I.J.R. | \$40,400 |
| 15. | 4/4/2016 | SONIA L. MEZQUITA VEGA | Seattle, WA | S.N.A. | \$40,100 |

¹ Date shown is on or about the date of deposit and/or date it posted in the bank's system.

| COUNT | DATE ¹ | DEPOSITOR/ DEFENDANT | WELLS FARGO BRANCH LOCATION | ACCOUNT HOLDER/ DEFENDANT | AMOUNT OF CASH DEPOSITED OR WITHDRAWN |
|-------|-------------------|-----------------------------------|--------------------------------------|---|---|
| 16. | 4/4/2016 | DALIA L. ARCINIEGA BECERRA | Seattle, WA | M.Y.C. | \$28,100 |
| 17. | 4/15/2016 | ARMANDO LOPEZ CORRAL | New York, NY | M.A.C. | \$40,220 |
| 18. | 4/15/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | E.M.R. | \$39,740 |
| 19. | 4/16/2016 | SONIA L. MEZQUITA VEGA | New York, NY | P.W. | \$42,120 |
| 20. | 4/18/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | C.Y.S. | \$32,540 |
| 21. | 5/9/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | P.Y.B. | \$28,793 |
| 22. | 5/10/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | A.I.B | \$40,587 |
| 23. | 9/1/2016 | JORGE LOPEZ CORRAL | New York, NY | MARIA TERESA VALENCIA RENTERIA | \$15,000 |
| 24. | 3/23/2017 | ROLANDO ESPINDOLA HERNANDEZ | Seattle, WA | A.H. | \$4,000 |
| 25. | 3/23/2017 | ROLANDO ESPINDOLA HERNANDEZ | Seattle, WA | J.R. | \$5,000 |
| 26. | 6/8/2017 | ROLANDO ESPINDOLA HERNANDEZ | Kenmore, WA | J.W.G. | \$5,000 |
| 27. | 6/10/2017 | ROLANDO ESPINDOLA HERNANDEZ | Edmonds, WA | M.F.A. | \$6,000 |
| 28. | 8/9/2017 | ROLANDO ESPINDOLA HERNANDEZ | Shoreline, WA | A.M.V. | \$5,000 |
| 29. | 12/16/2017 | FRANCISCO VALDEZ BUSANI | Lynnwood WA | A.R. | \$9,000 |

| COUNT | DATE ¹ | DEPOSITOR/ DEFENDANT | WELLS FARGO BRANCH LOCATION | ACCOUNT HOLDER/ DEFENDANT | AMOUNT OF CASH DEPOSITED OR WITHDRAWN |
|-------|-------------------|-------------------------------|--------------------------------------|---------------------------------|---|
| 30. | 12/16/2017 | JORGE LOPEZ CORRAL | Lynnwood, WA | A.R. | \$9,000 |
| 31. | 12/22/2017 | FRANSICO VALDEZ BUSANI | Albuquerque, NM | RAFAEL ALEJANDRO CANEZ | \$9,500 |
| 32. | 12/22/2017 | FRANCISCO VALDEZ BUSANI | Albuquerque, NM | RAFAEL ALEJANDRO CANEZ | \$9,500 |
| 33. | 1/16/2018 | JORGE LOPEZ CORRAL | Everett, WA | FRANSCICO VALDEZ BUSANI | \$9,000 |
| 34. | 1/17/2018 | JORGE LOPEZ CORRAL | Lynnwood, WA | JORGE VALDEZ | \$7,500 |
| 35. | 1/19/2018 | FRANSCICO VALDEZ BUSANI | Everett, WA | RAFAEL ALEJANDRO CANEZ | \$9,500 |
| 36. | 1/19/2018 | FRANSCICO VALDEZ BUSANI | Everett, WA | JORGE VALDEZ | \$9,500 |
| 37. | 1/19/2018 | FRANSCICO VALDEZ BUSANI | Everett, WA | JORGE VALDEZ | \$9,500 |
| 38. | 2/3/2018 | ARMANDO LOPEZ CORRAL | Everett, WA | E.L.C. | \$8,500 |
| 39. | 2/3/2018 | ARMANDO LOPEZ CORRAL | Everett, WA | V.V.L. | \$8,500 |
| 40. | 2/4/2018 | ALEXIS BARON MERCADO | Everett, WA | ALEXIS BARON MERCADO | \$3,500 |
| 41. | 2/14/2018 | PEDRO PARRA | Everett, WA | A.V. | \$9,000 |
| 42. | 2/14/2018 | RAFEAL ALEJANDRO CANEZ | Everett, WA | ALEXIS BARON MERCADO | \$9,000 |

The Grand Jury further alleges that each such Count was conducted during and in furtherance of the conspiracy charged in Count 1.

All in violation of Title 18, United States Code, Sections 1956(a)(1)(B)(i) and 2.

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COUNTS 43 - 64**(Money Laundering - 1957)**

On or about the dates set forth below, in the Western District of Washington, and elsewhere, the defendants BARBARA P. CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, and JORGE G. DURAN ACOSTA and the Defendants specified in each Count below did knowingly engage, attempt to engage, and aid and abet, in the following monetary transactions through or to a financial institution, affecting interstate or foreign commerce, in criminally derived property of a value greater than \$10,000, that is the deposit of U.S. currency, such property having been derived from a specified unlawful activity, that is, the distribution of controlled substances:

| COUNT | DATE ² | DEPOSITOR/ DEFENDANT | WELLS FARGO BRANCH LOCATION | ACCOUNT HOLDER/ DEFENDANT | AMOUNT OF CASH DEPOSITED OR WITHDRAWN |
|-------|-------------------|----------------------------------|--------------------------------------|----------------------------------|---|
| 43. | 7/29/2015 | JORGE J. NAVARRETTE | Lenexa, Kansas | J.A.G.A. | \$34,965 |
| 44. | 7/29/2015 | JORGE J. NAVARRETTE | Shawnee, KS | A.O. | \$35,000 |
| 45. | 7/29/2015 | JORGE J. NAVARRETTE | Overland Park, KS | D.S.M. | \$35,032 |
| 46. | 12/31/2015 | SONIA L. MEZQUITA VEGA | Tucson, Arizona | DALIA L. ARCINIEGA BECERRA | \$32,500 |
| 47. | 2/3/2016 | SONIA L. MEZQUITA VEGA | Nogales, AZ | C.G.R. | \$39,980 |
| 48. | 3/14/2016 | DALIA L. ARCINIEGA BECERRA | Lynnwood, WA | A.O. | \$20,200 |
| 49. | 3/14/2016 | DALIA L. ARCINIEGA BECERRA | Everett, WA | J.R.V. | \$35,971 |
| 50. | 3/14/2016 | SONIA L. MEZQUITA VEGA | Lynnwood, WA | N.Y.G. | \$30,030 |
| 51. | 3/16/2016 | SONIA L. MEZQUITA VEGA | Nogales, AZ | ARMANDO LOPEZ CORRAL | \$35,971 |

² Date shown is on or about the date of deposit and/or date it posted in the bank's system.

| COUNT | DATE ² | DEPOSITOR/ DEFENDANT | WELLS FARGO BRANCH LOCATION | ACCOUNT HOLDER/ DEFENDANT | AMOUNT OF CASH DEPOSITED OR WITHDRAWN |
|-------|-------------------|----------------------------------|--------------------------------------|---|---|
| 52. | 3/31/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | L.G.G. | \$39,720 |
| 53. | 3/31/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | C.A.R. | \$39,620 |
| 54. | 3/31/2016 | ARMANDO LOPEZ CORRAL | New York, NY | J.L.S. | \$40,332 |
| 55. | 4/1/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | I.J.R. | \$40,400 |
| 56. | 4/4/2016 | SONIA L. MEZQUITA VEGA | Seattle, WA | S.N.A. | \$40,100 |
| 57. | 4/4/2016 | DALIA L. ARCINIEGA BECERRA | Seattle, WA | M.Y.C. | \$28,100 |
| 58. | 4/15/2016 | ARMANDO LOPEZ CORRAL | New York, NY | M.A.C. | \$40,220 |
| 59. | 4/15/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | E.M.R. | \$39,740 |
| 60. | 4/16/2016 | SONIA L. MEZQUITA VEGA | New York, NY | P.W. | \$42,120 |
| 61. | 4/18/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | C.Y.S. | \$32,540 |
| 62. | 5/9/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | P.Y.B. | \$28,793 |
| 63. | 5/10/2016 | DALIA L. ARCINIEGA BECERRA | New York, NY | A.I.B | \$40,587 |
| 64. | 9/1/2016 | JORGE LOPEZ CORRAL | New York, NY | MARIA TERESA VALENCIA RENTERIA | \$15,000 |

The Grand Jury further alleges that each such Count was conducted during and in furtherance of the conspiracy charged in Count 1.

All in violation of Title 18, United States Codes, Sections 1957 and 2.

COUNTS 65 -97

(International Money Laundering 18 U.S.C. 1956(a)(2)(B)(i))

On or about the dates set forth below, in the Western District of Washington, and elsewhere, BARBARA P. CARRENO ORTEGA, LUIS A. CARRENO ORTEGA, ERIKA VIVIANA CARRENO ORTEGA and MARIA TERESA VALENCIA RENTERIA and the Defendants specified in each Count below, did knowingly transport, transmit and transfer, and attempt to transport, transmit and transfer, and aid and abet the same, monetary instruments and funds from a place within the United States to a place outside the United States, namely, by causing the wire transfers set forth below from Wells Fargo bank accounts within the United States to bank accounts in Mexico, for the direct or indirect benefit of MARIA TERESA VALENCIA RENTERIA on behalf the other conspirators, which involved the proceeds of a specified unlawful activity, that is the distribution of controlled substances in Violation of Title 21, United States Code, Section 841(a)(1), knowing that the transaction was designed in whole and in part to conceal and disguise, the nature, source, ownership, and control of the proceeds of said specified unlawful activity and that while conducting and attempting to conduct such financial transaction knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

| COUNT | DATE OF WIRE ³ | WELLS FARGO ACCOUNT HOLDER/ DEFENDANT | RECIPIENT INSTITUTION IN MEXICO | AMOUNT OF WIRE |
|-------|---------------------------|---------------------------------------|---------------------------------|----------------|
| 65. | 3/10/17 | E.D.C. | CIBanco | \$10,564 |
| 66. | 3/14/2017 | E.D.C. | CIBanco | \$9,800 |
| 67. | 4/21/2017 | S.V. | CIBanco | \$11,750 |
| 68. | 4/27/2017 | S.V. | CIBanco | \$18,300 |
| 69. | 8/28/2017 | J.B.S. | InterCam Banco | \$14,673 |
| 70. | 8/30/2017 | J.B.S. | InterCam Banco | \$4,800 |
| 71. | 12/19/2017 | FRANCISCO VALDEZ BUSANI | InterCam Banco | \$8,800 |

³ Date shown is on or about the date wire transfer and/or date it posted in the bank's system.

| COUNT | DATE OF WIRE ³ | WELLS FARGO ACCOUNT HOLDER/ DEFENDANT | RECIPIENT INSTITUTION IN MEXICO | AMOUNT OF WIRE |
|-------|---------------------------|---------------------------------------|---------------------------------|----------------|
| 72. | 12/20/2017 | J.B.S. | InterCam Banco | \$8,800 |
| 73. | 12/21/2017 | FRANCISCO VALDEZ BUSANI | InterCam Banco | \$17,400 |
| 74. | 12/21/2017 | J.B.S. | InterCam Banco | \$15,887 |
| 75. | 12/22/2017 | FRANCISCO VALDEZ BUSANI | InterCam Banco | \$17,00 |
| 76. | 12/26/2017 | RAFAEL A. CANEZ | InterCam Banco | \$18,600 |
| 77. | 12/26/2017 | J.B.S. | InterCam Banco | \$16,770 |
| 78. | 12/27/2017 | FRANCISCO VALDEZ BUSANI | InterCam Banco | \$23,700 |
| 79. | 1/18/2018 | RAFAEL ALEJANDRO CANEZ | CIBanco | \$34,129 |
| 80. | 1/18/2018 | Z.Z.C. | CIBanco | \$16,800 |
| 81. | 1/19/18 | FRANCISCO VALDEZ BUSANI | CIBanco | \$18,000 |
| 82. | 1/22/18 | JORGE VALDEZ | CIBanco | \$27,970 |
| 83. | 1/24/2018 | Z.Z.C. | InterCam Banco | \$8,955 |
| 84. | 1/25/2018 | FRANCISCO VALDEZ BUSANI | InterCam Banco | \$1,701 |
| 85. | 2/1/18 | JORGE VALDEZ | CIBanco | \$9,270 |
| 86. | 2/1/18 | Z.Z.C | CIBanco | \$30,970 |
| 87. | 2/5/18 | E.L.C. | InterCam Banco | \$23,940 |
| 88. | 2/5/2018 | Z.Z.C. | InterCam Banco | \$19,950 |
| 89. | 2/5/2018 | V.V.V. | InterCam Banco | \$17,515 |
| 90. | 2/8/2018 | ALEXIS BARON MERCADO | CIBanco | \$22,172 |
| 91. | 2/9/18 | E.L.C. | InterCam Banco | \$8,850 |
| 92. | 2/9/18 | Z.Z.C. | CIBanco | \$4,510 |
| 93. | 3/1/2018 | J.L.V.V. | InterCam Banco | \$12,690 |
| 94. | 3/14/18 | C.A.S.F | InterCam Banco | \$25,265 |

Indictment - 14

United States v. Carreno-Ortega, et al.

UNITED STATES ATTORNEY
700 STEWART STREET, SUITE 5220
SEATTLE, WASHINGTON 98101
(206) 553-7970

| COUNT | DATE OF WIRE ³ | WELLS FARGO ACCOUNT HOLDER/ DEFENDANT | RECIPIENT INSTITUTION IN MEXICO | AMOUNT OF WIRE |
|-------|---------------------------|---------------------------------------|---------------------------------|----------------|
| 95. | 3/15/18 | M.L.A. | Intercom Banco | \$22,360 |
| 96. | 3/19/18 | R.A.S. | Intercom Banco | \$34,970 |
| 97. | 3/20/18 | M.L.A. | Intercom Banco | \$34,695 |

The Grand Jury further alleges that each such Count was conducted during and in furtherance of the conspiracy charged in Count 1.

All in violation of Title 18, United States Code, Sections 1956(a)(2)(B)(i) and 2.

ASSET FORFEITURE ALLEGATION

The allegations contained in Counts 1 – 97 of this Indictment are hereby realleged and incorporated by reference for the purpose of alleging forfeiture. Upon conviction of any of the offenses alleged in Counts 1 – 97, the relevant Defendants shall forfeit to the United States, pursuant to Title 18, United States Code, Section 982(a)(1), all property that constitutes or is traceable to proceeds of the offense, as well as all property involved in the offense. This property includes, but is not limited to, sums of money reflecting the proceeds each Defendant obtained as a result of the offense.

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of any act
2 or omission of any defendant,

- 3 1. cannot be located upon the exercise of due diligence;
- 4 2. has been transferred or sold to, or deposited with, a third party;
- 5 3. has been placed beyond the jurisdiction of the Court;
- 6 4. has been substantially diminished in value; or,
- 7 5. has been commingled with other property which cannot be divided
8 without difficulty;

9 it is the intent of the United States to seek the forfeiture of any other property of the defendant,
10 up to the value of the above-described forfeitable property, pursuant to Title 21, United States
11 Code, Section 853(p).

12 A TRUE BILL:

13 DATED: *August 12, 2020*

14 *Signature of Foreperson redacted*
15 *Pursuant to the policy of the Judicial*
16 *Conference of the United States*

17 _____
18 FOREPERSON

19 _____
20 BRIAN T. MORAN
21 United States Attorney

22 _____
23 VINCENT T. LOMBARDI
24 Assistant United States Attorney